

# STATE OF COLORADO

Roy Romer, Governor  
Patti Shwayder, Executive Director

*Dedicated to protecting and improving the health and environment of the people of Colorado*

**HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION**  
<http://www.cdphe.state.co.us/hm/>

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Denver, Colorado 80246-1530  
Phone (303) 692-3300  
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222 S. 6th Street, Room 232  
Grand Junction, Colorado 81501-2768  
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**Colorado Department  
of Public Health  
and Environment**

June 18, 1998

Karan North  
Kaiser-Hill Company, L.L.C  
Rocky Flats Environmental Technology Site  
P.O. Box 464  
Golden, Colorado 80402-0464

**RE: Close-Out of the May 28th, 1998 Partial Compliance Inspection of Building #881, EPA  
Identification Number CO7890010526**

Dear Ms. North:

On May 28th, 1998, inspectors from the Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division"), conducted a partial compliance evaluation of Building #881. The Division received and reviewed your response to that inspection, on June 11th, 1998. Based upon our review of your response, all issues identified during the referenced inspection have been resolved to the satisfaction of the Division. Therefore, the Division does not intend to take any further action in response to this inspection.

The Division appreciates your timely and complete response to the issues identified during the May 28th 1998, inspection. Please contact Cynthia Silva Burbach of my staff at (303) 692-3315 if you have any questions regarding this memorandum or the close-out of the inspection.

Sincerely,

Joe Schieffelin, Unit Leader  
Federal Facilities Permitting and Compliance  
Hazardous Materials & Waste Management Division

cc: w/attach

cc: w/o attach

Janice Pierson, EPA  
Celia Moynihan, RMRS  
Bob Cathel, K-H  
James Hindman, CDPHE  
Edward Smith, CDPHE

Bob April, DOE  
Dan Miller, AGO

**ADMIN RECORD**

IA-A-000403

116

EPA I.D. #CO7890010526

COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

HAZARDOUS WASTE INSPECTION REPORT

DATE OF INSPECTION: May 28th, 1998

FACILITY: Rocky Flats Environmental Technology Site - US DOE,  
RFETS, Building 881

LOCATION: 16 miles NW of Denver  
Golden, CO 80402

FACILITY REP: Celia Moynihan, RMRS

TELEPHONE: 303-966-7000

NOTIFICATION STATUS: Large Quantity Generator  
Land Disposal Facility

TYPE OF INSPECTION: Partial Compliance Evaluation  
(Evaluation of Chemical Removal from Building 881)

PARTICIPANTS: Cynthia Silva Burbach, CDPHE  
Ed Smith, CDPHE  
Bob Cathel, K-H  
Celia Moynihan, RMRS  
Chuck Albin, RMRS

WEATHER CONDITIONS: Warm

TIME IN: 8:00 am

TIME OUT: 11:30 am

## INTRODUCTION

Division inspectors arrived at Building 881 to conduct a partial compliance evaluation. The scope of this inspection was to evaluate the removal of waste chemicals from this building by Radian. Approximately 9,150 waste chemicals have been removed from building 881 in the last several months. The Division received the completion letter for building 881 on April 14, 1998.

## OPERATIONS INSPECTED

### Room 266/General Labs

During past partial compliance evaluations numerous waste chemicals were observed in this area. It appeared that the majority of the segregating, bar coding and packing took place in this area. During this inspection inspectors opened numerous cabinets and drawers searching for waste chemicals which might have been forgotten, but found none. Several drawers and cabinets contained miscellaneous laboratory equipment and supplies. Facility representatives stated that they intended to find people who will use the excess equipment and supplies. The inspectors observed one 90 day area, which contained circuit boards, waste chemicals and waste oil. The drums in this particular area were given an 30 extension to the 90 day accumulation time period, because of the sample backlog in building 559. On the date of this inspection all containers in the 90 day area in room 266 were being transferred to Unit #1 and Unit 15A.

### Room 137/General Lab Area

This area was chemical free.

### 90 Day Area #143A

This Unit was empty at the time of inspection.

### Room #296 Non Rad 90 Day Area

This area had numerous small 5 gallon boxed containers of waste chemicals. There was no traveler or manifest information attached to the chemicals. According to facility representatives these chemicals were packed by Radian and left in the 90 day area until the proper paper work could be approved. The inspectors recorded several identifying numbers from the containers and asked for further clarification. One container was placed on the counter in such a way that the hazardous waste label was blocked by another container. This was pointed out to facility representatives and was corrected immediately.

### **Room #267 Treatment Unit**

Several metal cabinets in this area contained P1 and P2 chemicals awaiting treatment. No issues were identified with these chemicals. The inspectors did notice one container whose 90 day accumulation time period was due to expire on the day of inspection. Facility representatives stated that the container was to be shipped that day. The eye wash in this room had not been inspected since 4/6/98. It is a condition of the permit that this eye wash be inspected once a month.

### **DOCUMENT REVIEW**

1. Inspection log sheets for all 90 day areas.
2. WEMS reports.
3. Training records for several employees.

### **CLOSEOUT/FINDINGS**

1. Division inspectors requested copies of the following manifest/travelers for the following containers: CWM980019, CWM98001 and CWM980025.
2. The eyewash in room 267 had not been inspected since April 6, 1998. Facility representatives were asked to ensure that regular monthly inspections are completed in the future.
3. Facility representatives were asked to determine if Donald Clark has completed the necessary RCRA training.

### **ATTACHMENTS**

1. NOI
2. Response to NOI

## SIGNATURES

Prepared By:

Cynthia Silva Burbach  
Cynthia Silva Burbach

6/10/98  
Date

Reviewed By:

Edward H. Smith  
Ed Smith

6/10/98  
Date

Approved By:

Joe Schieffelin  
Joe Schieffelin

6/10/98  
Date

Author: Bob Cathel at mail4

Date: 5/26/98 3:42 PM

Priority: Normal

Receipt Requested

TO: Ted Hopkins at Hotel17

TO: Celia Moynihan at Mail5

TO: Karen Lavorato

TO: Mike Jennings at Mail1

CC: John Wrapp at Delta13

Subject: CDH Chemical Verification at B881

----- Message Contents -----

On Thursday (5/28) Cindy Burbach with CDPHE will be inspecting B881 from 8 am till noon. This inspection will focus on chemicals but will not be limited to chemicals only. I will get the inspection on the POD and secure the appropriate RCT support. Please ensure that the appropriate personnel are available to support this inspection.

I will be meet any support personnel at B881 at 8 am on Thursday. Please let me know who to expect (X6880, pgr 212-3098).

If you have any questions or concerns please contact me.

Thanks,

Bob Cathel